

# EthicalView Reporting Policy

(earlier known as Fraud Risk Management Policy)

ACC Limited

## 1. INTRODUCTION

### **Commitment**

ACC Limited and its consolidated affiliated companies ("**ACC**") is committed to integrity and an open culture where everybody feels secure in seeking advice or raising concerns, and has confidence that reports are handled in a professional and transparent way.

### **EthicalView Reporting System**

To enable employees and other stakeholders to report concerns or fraud / misconduct, ACC established the EthicalView Reporting System, a secure online and phone-based whistle-blowing system hosted by an independent third party ("**EthicalView**"). EthicalView is designed to receive reports related to all relevant ACC business operations, units and employees. EthicalView also provides for safeguards against victimization of reporters.

### **Replacing Fraud Risk Management Policy**

This EthicalView Reporting Policy ("**EthicalView Policy**") replaces the former Fraud Risk Management Policy dated 4 December 2008.

### **NOT an Emergency Service**

Employees and other stakeholders must not use EthicalView to report events presenting an immediate threat to life, health or property. As set out below, reports submitted through EthicalView may not receive an immediate response.



## 2. PURPOSE, OBJECTIVES AND SCOPE OF APPLICATION

### **Purpose**

The EthicalView Policy is a comprehensive resource guide for ACC employees and third party stakeholders who feel they should raise a concern or report suspected fraud / misconduct. It aims to protect the Company's brand, reputation and assets from loss or damage, resulted from suspected or confirmed violations of the law or the Company's Code of Business Conduct.

The processes set out in the EthicalView Policy reflect the Company's vigilance and whistle-blowing mechanism for the detection and remediation of compliance violations, as required under section 177 of the Companies Act 2013 and Regulation 22 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

### **Objectives**

The EthicalView Policy helps to strengthen the existing anti-fraud and compliance culture. It shall also raise awareness and provide assurance as to:

- Fostering open communication;
- Promoting the Company's zero tolerance to non-compliance; and
- Encouraging and enabling all employees and other stakeholders to report cases of potential fraud or misconduct (it will be ensured that no employee is discriminated or unfairly treated for reporting such cases in good faith).

### **Scope of Application**

The EthicalView Policy applies to all directors, officers and employees of the Company. Its principles apply equally to third parties, including its vendors, customers and employees of other agencies hired to provide the Company with supplies or services or any other person who may wish to report a concern related to a potential violation of the Company Code of Business Conduct (collectively, "**Reporters**").

## 3. WHEN SHOULD REPORTERS SPEAK UP?

### **Reporting of misconduct**

Every Reporter should feel comfortable to speak up, ask questions when unsure and report in good faith alleged violations of the Company's Code of Business Conduct, policies or directives. In this context "good faith" means that the Reporter:

- (i) provides all of the information they have,
- (ii) reasonably believes that the allegations are substantially true, and

- (iii) is not acting for personal gain.

### ***Not to report frivolous information***

While reporting a concern or fraud / misconduct, Reporters must be aware that the information provided or the allegations made could result in investigations and decisions that affect other employees or third parties. Accordingly, only information that is fact-based and reasonably accurate to the best of the Reporter's knowledge should be reported. Any information that is malafide, baseless, malicious, lacking good faith will be considered as 'frivolous information'. Reporters abusing the EthicalView reporting system by knowingly reporting frivolous information affecting employees or third parties may face disciplinary consequences.

## **4. MEANS OF REPORTING VIOLATIONS**

### ***Reporting avenues***

Reporters may raise a concern or report a violation through the EthicalView system. The EthicalView system is independently hosted by a specialized third party service provider and gives Reporters the choice between the following reporting options:

- Making a call to the toll-free number **1800 209 2008** or a voice message can be sent at Toll Free Number: **0008000410035** (calls from mobile phones only)
- Sending an email to [acc@ethicalview.com](mailto:acc@ethicalview.com)
- Sending a letter to **PO Box 137, Pune 411001** or directly to the **Chairman of the ACC Audit Committee** at ACC's registered office
- Sending a fax to +91 (22) 6645 9575
- Filing an online report or obtaining guidance by asking questions at <https://integrity.lafargeholcim.com>

### ***Details to be reported***

While raising a concern, Reporters should describe the type of concern (as mentioned in section 5 below) and provide as many relevant facts as possible, including dates, persons, details and explanations in relation to the reported fraud or misconduct. For any action to be taken, Reporters need to tell:

- Your name and contact details
- Name of the person suspected of misconduct
- What is the misconduct about
- Other details like conversations, telephone numbers, third parties involved etc.

### ***Do's and don'ts while reporting***

- Ensure timely reporting of incidents as any delay in reporting may cause substantial financial and/or reputational damages
- Report only to the channels mentioned above and do not report to any other person within or outside the organization
- Do not try to solve the case yourself
- Note that direct confrontation may give clues to the suspect who may destroy crucial evidence
- Do not tamper with original documents
- Secure the evidence at the earliest convenience
- Do not discuss with others both inside and outside of ACC

## **5. WHAT CAN BE REPORTED THROUGH ETHICALVIEW ?**

### ***What can be reported through EthicalView?***

Any employee with knowledge of suspected or confirmed fraud or misconduct or who is personally being placed in a position by another person to participate in a fraudulent or otherwise illegal activity must report the case immediately.

The categories and types of reports that can be made via the EthicalView system follow the Company's Code of Business Conduct, policies and directives are as follows:

- Abusive labor/employment practices
- Accounting and audit irregularities
- Bribery, corruption and kickbacks
- Competition law violations
- Conflicts of interest
- Discrimination, harassment and workplace violence
- Environmental violations
- Falsification of company records
- Financial irregularities
- Fraud/Theft
- Human rights violations
- Insider trading
- Health & Safety violations
- Release of confidential information

- Retaliation against Reporters
- Trade Law, Sanction & Embargo Violations
- Money Laundering

The above list is illustrative and Reporters can report any other violations of applicable law or any other instances of unethical, biased, imprudent conduct.

## 6. OBLIGATIONS GOVERNING THE REPORTING PROCESS

### ***Reporting by Employees***

It is the responsibility of all employees to:

- speak up in case they become aware of a potential violation of the law or Code of Business Conduct to their supervisor, supervisor's boss, the head of the Function or department or the Compliance Officer or the MD / CEO, or through any of the channels in Section 4 above.
- Refrain from initiating a local review or investigation into the allegations.

### ***Reporting by Senior Management***

The following specific obligations apply to the senior management of ACC, i.e the EXCO members, their direct reports and the heads of the finance, legal, procurement, accounting, internal control and internal audit departments:

- Mandatory and prompt reporting of all alleged violations of the ACC Code of Business Conduct or the law that are brought to their attention to the EthicalView Committee.

## 7. REPORTING OUTSIDE OF ACC CHANNELS

### ***Limitations on reporting***

Reporters are bound to strict confidentiality and loyalty under their employment contract with ACC. Subject to the following paragraph, Reporter may not disclose any internal information, including information about suspected improper activities, to public authorities or third parties outside ACC reporting channels specified in Section 4 above without the prior approval of the Head of Legal / Compliance Officer.

Exceptions apply only if and to the extent applicable local law (i) prohibits such limitations on Reporter's disclosure rights to public authorities, or (ii) protects, or even demands, reports to public authorities without bringing the activity to the attention of the responsible supervisor or another designated internal function

beforehand and thereby affording the employer a reasonable opportunity to correct the improper activity

### 8. DATA SECURITY AND PRIVACY

All data related to the EthicalView System (available on IntegrityLine as "IL Data") is managed by:

LafargeHolcim Group Services Ltd  
Group Investigations  
Hagenholzstrasse 85  
8050 Zurich, Switzerland  
("Data Controller")

The Reports made through EthicalView Reporting System are entered into the Integrity Line (IL) system of LafargeHolcim which is protected by state-of-the-art IT security principles. The Service Provider of IL is a specialized and independent service provider contractually bound to strict confidentiality and state of the art data security principles.

The EthicalView Committee/Audit Committee shall have uninterrupted access to the EthicalView System Data (available on the Integrity Line "IL Data")

All reports made in accordance with this Policy will be controlled by ACC EthicalView Committee. As such, investigation reports as well as supporting documentation will be stored locally as well as on LafargeHolcim's IL system and will be linked to the initial report. LafargeHolcim and all service providers involved in the data processing will take all reasonable technical and organizational precautions to preserve the security of the data and protect it from accidental or unlawful destruction or accidental loss and unauthorized disclosure or access.

Based on applicable data privacy laws, upon request, data subjects will be provided access to IL Data registered on him or her in order to verify data accuracy and rectify potentially inaccurate, incomplete or outdated data. All such requests will be directed to the Data Controller through the ACC EthicalView Committee. The Data Controller may, at its own discretion but subject to applicable data privacy laws, restrict the mentioned rights in order to protect the investigation process or other data subjects involved.

Based on applicable data retention and data privacy laws, the Data Controller will keep the EthicalView Reporting System data as long as required for any investigation, remediation process and, if applicable, to conclude any formal dispute resolution process. Personal data relating



to reports found to be unsubstantiated will be anonymized as soon as possible. Where legally permissible, the Data Controller may choose to anonymize EthicalView data once the applicable retention period has lapsed.

## 9. PROTECTION OF REPORTERS

### ***Confidentiality***

Company will take all steps necessary to ensure confidentiality throughout the reporting and investigation process, so Reporters raising concerns should not fear that their identity or EthicalView data will be improperly disclosed or abused.

If Reporters disclose their name when making a report, their identity may only be disclosed on a strictly need-to-know basis to selected persons involved in any investigation or remediation deemed necessary by or in the best interest of the Company.

### ***Anonymous reporting***

The Company strongly encourages all Reporters to disclose their identity and to state their name and a phone number or email address. Sharing ones identity when making a report will help Company conduct the most thorough investigation possible, because it may be more difficult to thoroughly investigate anonymous reports.

Regardless of how Reporters choose to report, all reports of actual or suspected fraud / misconduct will be taken seriously and addressed promptly.

Once Reporters choose to report on the IntegrityLine webpage anonymously, their report cannot be traced back to them. The secure IntegrityLine website does not log or record any IP address data, time stamps or metadata. All data is encrypted and stored on secure servers based with an independent service provider. The EthicalView reporting system is not part of the ACC IT or phone systems.

### ***Protection from retaliation***

The Company does not tolerate any form of disadvantaging or discrimination, as well as the threat thereof, as a reaction to raising concerns. Reporters who believe that they have been confronted with imminent or threatened retaliation by members of the organization are asked to immediately consult any of the EthicalView resources set out in Section 4 of this Policy.

ACC will take all measures that are required to protect the interests of the affected Reporter. In the event of alleged retaliation, a separate investigation regarding the alleged retaliation will be initiated. Individuals who take action against a Reporter for making a report or participating in an investigation will be subject to disciplinary action, up to and including termination of the employment contract.

## 10. INVESTIGATION AND SANCTIONING PROCESS

### ***Handling of Reports***

Regardless of how Reporters choose to report, all reports of actual or suspected fraud / misconduct will be taken seriously and addressed promptly. The appropriate investigation personnel will carefully investigate the reports and based on findings of the investigation appropriate necessary action will be taken.

The EthicalView Committee members will ensure all required steps for investigating and resolving the situation are taken. Reports not involving violations of the Company's Code of Business Conduct or pertaining to procedural shortcomings may be investigated and resolved by the relevant operating management or corporate functions.

For data privacy and other reasons, it may not be possible to communicate with the Reporter regarding the investigation process or disclose the investigation outcome.

## 11. PERIODIC REPORTING ON WHISTLEBLOWING AND INVESTIGATIONS, OTHERS

### ***Reporting***

The EthicalView Committee (formerly Fraud Risk Management Committee) will monitor and implement the EthicalView Reporting Policy and the underlying processes.

The EthicalView Committee will report on quarterly basis to the Audit Committee of Company's Board of Directors on all key aspects of compliance reporting, investigation and remediation activities.

### ***Sensitive Personal data or Information (SPDI)***

The Company reserves the right to, at its own discretion, disclose or transfer any data or communication (including SPDI) related to any director, officer or employee of the Company (or any other person), available either on the physical or electronic records, servers or computer resources maintained by the Company or which data or communication the Company may be provided with or acquire or come into possession of, either to an entity within the LafargeHolcim Group or to a third party. All persons falling within the scope of this EthicalView Policy hereby consent to the disclosure and / or transfer of such data or communication by the Company.



Company : ACC Limited  
Version : 02  
Date : 03 February, 2017



**ARUN KUMAR GANDHI**  
CHAIRMAN OF THE AUDIT COMMITTEE



**N.S. SEKHSARIA**  
CHAIRMAN OF THE BOARD OF DIRECTORS

